

Appendix J

Responses to Comments

Introduction

The Draft Program Environmental Impact Report (Draft PEIR) for the Mobility Element was distributed to trustee and responsible agencies, members of the public, other interested parties, and the State Clearinghouse for a 45-day public review and comment period that commenced on July 13, 2017 and ended on August 28, 2017. The document was made available online, at the Santee Branch library, and at Santee City Hall. A total of 6 letters were received before the close of the public comment period, as listed below.

List of Commenters

The following individuals and representatives of organizations and agencies submitted written comments on the Draft PEIR.

Letter	Individual or Signatory	Affiliation	Date Received
A	Scott Morgan, Director	California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	August 31, 2017
B	Gail K. Sevens Environmental Program Manager	California Department of Fish and Wildlife, South Coast Region	August 24, 2017
C	Roy Abboud, Acting Branch Chief	California Department of Transportation, District 11, Local Development and Intergovernmental Review Branch	August 28, 2017
D	Seth Litchney, Senior Regional Planner	San Diego Association of Governments	August 17, 2017
E	Jeff Murphy, Director	City of San Diego, Planning Department	August 28, 2017
F	Mary Kopaskie Brown, Chief	County of San Diego, Advance Planning Division, Planning and Development Services	August 31, 2017

Comments and Responses

State CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft PEIR and prepare a written response to each. The written response must address the significant environmental issue raised and must be detailed with a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines Section 15204).

State CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that

focus on the sufficiency of the Draft PEIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. State CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to State CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion. State CEQA Guidelines Section 15088 also recommends that where a response to comments results in revisions to the Draft EIR, those revisions be incorporated as a revision to the Draft EIR or as a separate section of the Final EIR. In accordance with CEQA Guidelines Section 15088.5 recirculation of the EIR is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

Written comments on the Draft PEIR are reproduced on the following pages, along with responses to those comments. The comments submitted do not require changes to the impact conclusions or additional mitigation to be incorporated that would mitigate a newly identified significant impact. No new information, new impacts, or deficiencies are identified that cannot be remedied through minor revisions to the Draft PEIR. To assist in referencing comments and responses, the following coding system is used:

- Comment letters are coded by letters, and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1 is referred to as A-1).

Where changes to the Draft PEIR text result from responding to comments, those changes are demarcated with revision marks (underline for new text, ~~striketrough~~ for deleted text).

LETTER

RESPONSE



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

August 29, 2017

RECEIVED

AUG 31 2017

Michael Coyne
City of Santee
10601 Magnolia Avenue
Santee, CA 92071-1266

Dept. of Development Services
City of Santee

Subject: Santee Mobility Element Update
SCH#: 2016121022

Dear Michael Coyne:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 28, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916)-445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

A-1 This letter received from the Governor's Office of Planning and Research (OPR) confirms the conclusion of the review period by State agencies for the Mobility Element Draft Program Environmental Impact Report (PEIR). The letter includes appended comments by State agencies, which are included in this Responses to Comments document. The OPR letter is informational and does not raise an environmental issue requiring a response.

A-1

LETTER

RESPONSE

Document Details Report State Clearinghouse Data Base

SCH#	2016121022		
Project Title	Santee Mobility Element Update		
Lead Agency	Santee, City of		

Type	EIR	Draft EIR
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Description The proposed Mobility Element involves an update to the existing Circulation Element within the city's general plan 2020 to bring it up to date with current planning law, including AB 1358, also known as the 2008 Complete Streets Act. This proposed Mobility Element would identify the future vision and key direction for achieving a multi-modal transportation system that serves all Santee residents while accommodating anticipated future growth. Since the proposed project is intended to guide development of the city's transportation network through the year 2035, the proposed Mobility Element would outline proposed updates to the city's pedestrian, bicycle, public transit, and roadway networks. However, the proposed project is a planning project that identifies the potential future circulation network changes within Santee and, as such, specific project level details, such as the timing of their implementation or the construction details of individual improvements, are not known at this time. Future improvements would be evaluated at the project level at the time they are proposed as required under CEQA, including but not limited to, using the PEIR as a first level tiering document pursuant to section 15168 of the CEQA guidelines.

Lead Agency Contact

Name	Michael Coyne		
Agency	City of Santee		
Phone	619-258-4100 x160	Fax	
email			
Address	10601 Magnolia Avenue		
City	Santee	State	CA
		Zip	92071-1266

Project Location

County	San Diego		
City	Santee		
Region			
Lat / Long	32° 50' 53.7" N / 116° 58' 42.0" W		
Cross Streets	City of Santee boundary		
Parcel No.			
Township	Range	Section	Base

Proximity to:

Highways	SR-52, 125, 67, I-8
Airports	Gillspie Field, MCAS Miramar
Railways	Trolley Line
Waterways	San Diego River
Schools	13 schools
Land Use	Various. The Mobility Element Update encompasses all City land use designations and zoning classifications

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Regional Water Quality Control Board, Region 9; Air Resources Board, Transportation Projects; Native American Heritage

A-2 This first page of a two page attachment included with the OPR letter confirms the State agencies consulted for the Draft PEIR. No further action is required.

LETTER

RESPONSE

A-3

**Document Details Report
State Clearinghouse Data Base**

Commission; Public Utilities Commission

Date Received 07/14/2017 *Start of Review* 07/14/2017 *End of Review* 08/28/2017

A-3 This second page of a two page attachment included with the OPR letter confirms the public review period for the Draft PEIR. No further action is required.

LETTER



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



August 24, 2017

Mr. Michael Coyne, Associate Planner
City of Santee
Planning Division, Development Services Department
10601 Magnolia Avenue, Building #4
Santee, CA 92071

**Subject: Comments on the Programmatic Environmental Impact Report for the
City of Santee Mobility Element Update SCH # 2016121022**

Dear Mr. Coyne:

B-1 The California Department of Fish and Wildlife (Department), hereafter referred to as the Department, has reviewed the above-referenced draft Programmatic Environmental Impact Report (DPEIR) dated July 14, 2017. The Department has identified potential effects of this project on wildlife and sensitive habitats. The project details provided herein are based on the information provided in the DPEIR and associated documents.

B-2 The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§ 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of Santee is currently participating in the NCCP program through the preparation of a draft Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

B-3 The proposed project involves an update to the existing Mobility Element within the City's General Plan 2020 (2003) to bring it up to date with current planning law, including Assembly Bill (AB) 1358, also known as the 2008 Complete Streets Act. This proposed Mobility Element Update would identify the future vision and key direction for achieving a multi-modal transportation system that serves all Santee residents while accommodating anticipated future growth. Since the proposed project is intended to guide development of the City's transportation network through the year 2035, the proposed Mobility Element Update would outline proposed updates to the City's pedestrian, bicycle, public transit, and roadway networks. However, the proposed project is a planning project that identifies the potential future circulation network changes within Santee and, as such, specific project-level details, such as the timing of their implementation or the construction details of individual improvements, are not known at this time. Future improvements directly associated with the Mobility Element Update would be evaluated at the project level at the time they are proposed as required under CEQA, including but not limited to, using the PEIR as a first level tearing document pursuant to Section 15168 of the CEQA guidelines.

The DPEIR document identifies that the Mobility Element projects would have a potentially significant adverse effects on special status species, riparian habitat or other sensitive natural

RESPONSE

B-1 Comment noted.

B-2 Comment noted. As explained in Section 1.3.1 of the Draft PEIR, no public agency other than the City of Santee is required to approve the Mobility Element. Development of project-level components of the Mobility Element may require approval of Federal, State, responsible, and or trustee agencies such as the California Department of Fish and Wildlife (CDFW) with the PEIR as the overarching environmental document for such projects under the California Environmental Quality Act (CEQA).. As the commenter notes, the City is participating in the Natural Community Conservation Planning (NCCP) program through preparation of a draft Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

B-3 Comment noted. The commenter notes the purpose of the Mobility Element and that the corresponding PEIR identifies potentially significant adverse effects on special status species, riparian habitat or other sensitive natural communities, including wetlands. No further response is required.

LETTER

Mr. Michael Coyne, Associate Planner
City of Santee
August 24, 2017
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communities, including wetlands. It also states that the projects have the potential to interfere substantially with the movement of native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The Mobility Element projects also have the potential to significantly conflict with the provisions of the proposed Santee MSCP SAP, or other approved local, regional, or state habitat conservation plan. According to DPEIR, there would be elements of proposed projects that would impact currently undeveloped areas, which have the potential to impact sensitive species and habitats, and would also encroach into the San Diego River, which is both a breeding area and provides habitat connectivity for many species. The DPEIR identifies Mitigation Measures MM Bio1 - MM Bio5 to reduce potential impacts below the threshold of significance. Since the proposed EIR document is programmatic, most project-specific information for individual projects would be deferred to later CEQA documentation.

B-4

We offer our comments and recommendations in the attached enclosure to assist the Santee in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts. In summary, our comments address the following issues: (1) consistency of underlying easements and route locations in relation to proposed conservation areas and the proposed SAP; (2) the need for updated information and clarity with subsequent CEQA review; (3) the need for further environmental documentation for impacts to natural resources; (4) the specificity and consistency of proposed mitigations measures with the proposed SAP; (5) cumulative impacts; (6) and lack of supporting data for significance determinations.

We appreciate the opportunity to comment on this DPEIR. The comments and recommendations provided are based on our knowledge of sensitive and declining vegetation communities in the County of San Diego and our participation in regional conservation planning efforts. We are hopeful that further consultation will ensure the protection we find necessary for the biological resources that would be affected by projects associated with this DPEIR. If you have questions or comments regarding this letter, please contact Elyse Levy of the Department at (858) 467-4237.

Sincerely,



for Gail K. Sevrens
Environmental Program Manager
South Coast Region

Enclosure 1
Department Comments

cc: State Clearinghouse
Eric Porter, USFWS
Mary Beth Woulfe, USFWS
Jon Avery, USFWS
Carol Roberts, USFWS

RESPONSE

B-4 Comment noted. Here CDFW summarizes its comments and recommendations as provided in a subsequent attachment, for which the City provides responses. No additional responses or action are required by the City because this comment does not raise a specific environmental issue or concern. City responses to CDFW comments are provided in the following pages.

LETTER

Mr. Michael Coyne, Associate Planner
City of Santee
August 24, 2017
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RESPONSE

B-5 References provided by the commenter are noted. No further response is required.

B-5

References:

California Natural Diversity Database (CNDDB) Calif. Dept. of Fish and Wildlife. Biogeographic Information and Observation System (BIOS). Retrieved August 4, 2017 from <http://bios.dfg.ca.gov>

Jennings, M., 2017 SR-67 Multi-species Connectivity Planning, Available from: San Diego Management and Monitoring Program (SDMMP) https://portal.sdmmp.com/view_project.php?sdid=SDID_mjennings%40mail.sdsu.edu_588ebd5fa8561.

LETTER

Wildlife Agency Comments and Recommendations on the Notice of Availability of a Draft Environmental Impact Report for The City of Santee Mobility Element Update

Specific Comments

- B-6** { 1. The DPEIR states "Policy 7.3: The City should promote the development of hiking and bicycle trails along the San Diego River in conjunction with the San Diego River Plan." The Department recommends that the final PEIR state that any plans for trails must be consistent with underlying easements, planning documents, and be located in the least environmentally sensitive areas and accompanied by site-specific analysis.
- B-7** { 2. Policy 2.2 states Policy 2.2: The City should ensure adequate accessibility for all modes to the northern undeveloped area of the City by designating a functional network of public streets for future dedication either prior to, or concurrent with, anticipated need. The City should ensure that the future network in the undeveloped areas do not preclude conservation of areas that will be required as part of the City's proposed Subarea Plan (SAP). The extension of North Magnolia Avenue and Fanita Parkway should be analyzed in the context of the Fanita Ranch subunit planning.
- B-8** { 3. Figure 3 shows the construction Cottonwood Avenue which would require a new bridge over the San Diego River, which is currently designated a 100% conservation area in the proposed Subarea Plan. The area also has the potential to support State-listed tricolored blackbird (*Agelaius tricolor*), numerous bat species, and San Diego Ambrosia (*Ambrosia pumila*) which is a narrow endemic plant species in the (CNDDDB, 2017). This segment as proposed would conflict with current land designations in the proposed subarea plan. Later in the document in section 4.2 Impact-BIO-6 states, "Any significant impacts to biological resources (e.g. special-status species, sensitive habitats) would potentially conflict with the City's MSCP Subarea Plan (currently in draft)"...but "Implementation of measures MM-BIO-1 through MM-BIO-5 would reduce Impact-BIO-6 to a less than-significant level as it would ensure that the proposed individual projects would not conflict with the draft MSCP Subarea Plan." Nothing in measure MM1-MM5 would ensure avoidance of conflicts with the proposed SAP in order to mitigate it below the threshold of significance since it would not preclude conflicts. The Department recommends that the City add another measure to ensure the proposed SAP is reviewed prior to individual project proposals and that any project that conflicts with the SAP is removed or revised to be consistent. This also includes review of surrounding jurisdictions' MSCP Subarea plans, as needed for projects like Mast Boulevard.

RESPONSE

- B-6** The Final PEIR states that any plans for trails along the San Diego River must be accompanied by a site-specific analysis, as required under CEQA, to confirm that such trails are consistent with the Subarea Plan (SAP) and located in the least environmentally sensitive areas. This revision to Policy 7.3 in Section 3.6.1.5 of the Final PEIR is presented in underline/strikethrough format. Corresponding Policy 7.3 of the Mobility Element has also been updated with the same language and the changes are shown in underline/strikethrough format.
- B-7** The City agrees with the commenter that the extension of Magnolia Avenue and Fanita Parkway should be analyzed in the context of the Fanita Ranch subunit planning. The proposed Mobility Element is a policy document that does not propose the construction of any project-level transportation improvement such as a roadway extension. Any potential future extension of Magnolia Avenue and Fanita Parkway will be assessed as part of the Fanita Ranch Specific Plan Environmental Impact Report. The roadway network maps in the PEIR and draft Mobility Element only show general alignments of Magnolia Avenue and Fanita Parkway. The ultimate alignment will be proposed with the Fanita Ranch Specific Plan and will be evaluated against the City's proposed SAP for conservation purposes. The Mobility Element does not preclude the conservation of lands in accordance with the City's proposed SAP.
- B-8** The PEIR provides a programmatic level environmental analysis of the Mobility Element, which is a planning document that does not provide for the design or construction of any specific transportation improvement project. The transportation network maps provided in the Mobility Element and PEIR identify general locations of potential future transportation improvements, such as a Cottonwood Avenue bridge. Although the ultimate design of Cottonwood Avenue bridge is not identified with this policy document, the subject roadway segment currently exists as an unpaved at-grade culvert crossing with existing right-of-way across the San Diego River. The future design of the crossing is unknown at this time but would be a covered project under the...

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RESPONSE

[B-8 response continued from previous page] ... proposed Subarea Plan. Construction of a crossing at this location will require a detailed environmental analysis with an assessment of project-specific biological impacts and consistency with the proposed Subarea Plan. Such a subsequent environmental analysis would include consultation with CDFW and US Fish and Wildlife Service and implementation of no net loss provisions and any applicable mitigation measures. Nevertheless, the City has augmented mitigation measure MM-BIO-1 in the Final PEIR to clarify that future transportation improvement projects would be evaluated with the City's SAP and any applicable MSCP Subarea Plans from surrounding jurisdictions. The revised mitigation measure is presented in MM-BIO-1 in Section 4.2.5 of the PEIR with revisions shown in underline/strikethrough format. Furthermore, MM-BIO-4 in Section 4.2.5 of the PEIR has been augmented to include language that indicates that future projects identified by the Mobility Element shall result in no net loss of either wetland habitat values or acreage. The changes does not constitute significant new information under Section 15088.5(b) of the CEQA Guidelines, no new significant environmental impacts of the program have been identified, and the conclusion that specific projects would be consistent with the Subarea Plan remains the same.

LETTER

RESPONSE

B-9

4. The Cottonwood Avenue site on the San Diego River plays a significant role in wildlife breeding and wintering. In addition to the species mentioned above, numerous other migratory avian species have potential to use the site, including least Bell's vireo (*Vireo bellii pusillus*), yellow warbler (*Dendroica petechia brewsteri*), yellow-breasted chat (*Icteria virens auricollis*), and Cooper's hawk (*Accipiter cooperii*), which are either State Listed or Species of Special Concern (CSC). Several subspecies of willow flycatcher migrate through the San Diego River watershed and it is possible that the southwestern willow flycatcher occurs on site as a short term migrant species. Among species that potentially use the area as a stop-over or nesting area are common yellowthroat (*Geothlypis trichas*), marsh wren (*Cistothorus palustris*), yellow-rumped warbler (*Dendroica coronata*), waterfowl such as mallards and grebes, and raptor species such as white-tailed kite (*Elanus leucurus*, a State Fully Protected Species). The site also provides year-round habitat for amphibian, reptile, and mammal species, and serves as a local wildlife corridor allowing movement of resident animals within their home range. The biological functions provided by the San Diego River, and its support of listed and sensitive species, are why the riparian corridor is within the City's 100% conserved areas. The Department strongly discourages development in or conversion of wetland and riparian habitats, and oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. The Department is concerned about the biological impacts from the direct take of habitat and the additional fragmentation that the proposed bridge would cause on the already constrained habitat supported by the San Diego River. We are particularly concerned that the proposed mitigation for the bridge-related impacts may not meet the requirement of "no net loss" of habitat value.

B-10

5. Section 2.2.1 states that the City is 41.6 % vacant based on 2003 numbers. Yet the document acknowledges on page 2-1 that, "State CEQA Guidelines Section 15125 states that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective." Some information provided in Section 2 is from 2003 and is very outdated; please provide an updated estimate based on conditions at the time of NOP. The document also shows data from 2003 in Figure 2-3, but this information is not legible.

B-11

6. Section 3.6.2.2 discusses Bicycles and the need to enhance recreational opportunities. Bicycle facilities should be located on developed and previously disturbed lands, and located on the outside edge of conservation areas rather than through them. This section also mentions the City of Santee Bicycle Master Plan 2009, and identifies the need for education programs that support the bicycle community. Part of this program should include discussions of how bicycling and the creation of unauthorized trails can have an impact of wildlife resources, and ways those can be prevented, and acknowledge the potential threat to habitats if unauthorized trails are not monitored or enforced.

B-9 See response to comment B-8.

B-10 The 41.6% vacant land figure provided in the PEIR is the best available estimate as retrieved from the currently adopted General Plan Land Use Element (2020). The land uses reflected in the Land Use Element have had minor modifications since it was adopted in 2003 and as such, the figure for vacant land is reliable. These land use figures will be recalculated upon a new comprehensive update to the General Plan. The City acknowledges that the Land Use Map (Figure 2-3) is pixelated such that its smallest fonts are difficult to read at the scale provided; however, the land use designations in the map are discernable and the map is readily available from the City's website. Nevertheless, the City has replaced Figure 2-3 with a higher resolution figure in the Final PEIR.

B-11 The Mobility Element is a planning document that updates the City's existing Circulation Element; it does not propose approval of any specific bicycle facility improvements. The environmental effects of future bicycle facilities identified in the Mobility Element would be evaluated on a project-by-project basis for consistency with the City's SAP and as required under state and federal environmental laws. The City agrees with the commenter that bicycle educational awareness programs should include discussions on how bicycling and the creation of unauthorized trails can have an impact on wildlife resources and provide ways those impacts can be prevented, while acknowledging the potential threat to habitats if unauthorized trails are not monitored or enforced. Policy 7.2 in Section 3.6.1.5 of the DPEIR and Policy 7.2 of the draft Mobility Element have been revised to state that bicycle educational awareness programs are to include an environmental component that teaches bicyclists the importance to wildlife resources of staying on designated trails. The revisions are presented in underline/strikethrough format.

LETTER

- B-12** 7. Section 3.6.4 notes that the DPEIR does not propose any physical construction, and that project specific impacts are not evaluated in the document. Therefore, the Department recommends that all projects that tier from this PEIR that will have impacts to natural resources and will require Biological Resource Technical Report (BRTR) will also have a subsequent CEQA environmental documentation analyzing and disclosing those impacts along with appropriate mitigation for the project specific impacts.
- B-13** 8. Table 4.2-1 states that the rationale for findings of less than significant with mitigation for Impact BIO-1 is that "Future projects located in areas with sensitive habitat present or special status plant species would be required to identify all individuals and mitigate any loss (direct or indirect) to a level less than significant through replacement, avoidance, or other acceptable means. The Department recommends that the final PEIR specify all acceptable means of mitigation. All means of mitigation for sensitive species and habitats must be acceptable to both the City as well as the Wildlife Agencies.
- B-14** 9. Section 4.2.2 identifies that the existing conditions for species and sensitive plants were analyzed by using CNDDB and CNPS databases, along with data from 2003. CNDDB and CNPS only provide information where resources have previously been surveyed, therefore an absence of a species in an area of suitable habitat is not sufficient to support a conclusion that the species is not present. The Department recommends that species-specific surveys be done in any area of appropriate habitat for the species for each individual project. Data from 2003 does not necessarily reflect conditions on the ground currently and therefore should be verified on a project-by-project basis. Since the City is conducting updated survey work for the conservation analysis to support the conclusions in the proposed SAP, this information should also be used to inform the planning process for the updated Mobility Element.
- B-15** 10. Page 4.2-20 discusses the California Endangered Species Act, and notes that an ITP or CD is required for projects that have the potential to directly impact state listed species. The Department would like to advise the Lead Agency that due to current Department policy CDs are no longer issued for State-listed plants.
- B-16** 11. MM-Bio-4 states "All permanent impacts to wetland waters shall be mitigated at a minimum 1:1 ratio through permittee responsible habitat restoration or through purchase of mitigation credits through an agency approved mechanism. Wildlife and other resource agencies may require a higher ratio." Uniform mitigation standards in the proposed SAP note that the presence of native species in the wetlands should be compensated by a 2:1 ratio. The Department recommends that the proposed ratio for wetland habitats be based on the complexity of habitat as well as the temporal loss associated with the project, and that final PEIR reflect that these factors will be taken into consideration during the individual project review.

RESPONSE

B-12 The Mobility Element is a comprehensive, long-term plan that does not propose approval of specific development projects. As explained in Section 1.3 of the Draft PEIR, the PEIR identifies all potential impacts that would result from project implementation at a programmatic level, which cannot always provide detailed analysis associated with project-level components. The PEIR identifies a range of potential impacts resulting from future development identified under the proposed Mobility Element and identifies mitigation measures that future development may implement to reduce identified potentially significant effects. The City will assess to what extent further environmental review and mitigation is required for future development pursuant to the requirements of CEQA Guidelines sections 15168 and 15162, including but not limited to the preparation of a Biological Resources Technical Report (BRTR) and consultation with the Wildlife Agencies.

B-13 See Response to Comment B-12. Further, for future development contemplated in the Mobility Element, MM-BIO-1 states that all recommendations in the BRTR shall be followed and shall consider incorporation of specified measures, including pre-construction nesting bird, roosting bat, and focused plan surveys and criteria for avoidance and mitigation depending upon the results of such surveys; mechanisms to avoid environmentally sensitive areas; sensitive vegetation communities mitigation at minimum ratios established by the Wildlife Agencies; biological monitoring, and a worker environmental awareness program. "Deferral of the specifics of mitigation is permissible where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan." (*Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275 [citation omitted].) Requiring mitigation to be developed in consultation with regulatory agencies can be sufficient to ensure that potential impacts will be adequately mitigated. Performance standards based on specific objectives that inform the agency "what it is to do and what it must accomplish" are sufficient. (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal.App.4th 214, 245.)

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RESPONSE

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- B-14** Comment noted. The City will continue to require species-specific surveys in any area of appropriate habitat for the species for each individual project as is current City practice for projects being assessed for environmental impacts under the provisions of CEQA. The survey work completed as part of the City's SAP will be used to inform additional species specific surveys on a project-by-project basis. The Mobility Element has provided sufficient detail at this time to understand the potentially significant impacts to biological resources at a program level. Furthermore, mitigation measure MM-BIO-1 requires plant and wildlife field surveys consistent with Wildlife Agency protocols to identify protected species that may be present in a future project's area of effect from its construction and operation.
- B-15** The language in Section 4.2.3.2 of the Draft PEIR indicating that a Consistency Determination may be approved under Section 2080.1 of the California Endangered Species Act has been removed and the change is reflected in the Final PEIR in underline/strikethrough format.
- B-16** The City has modified MM-BIO-4 in the Final PEIR to clarify that the proposed ratio for wetland habitats mitigation shall be based on the complexity of the habitat as well as the temporal loss associated with a project, as acceptable to the Wildlife Agencies through consultation on a project-by-project basis. The revision to MM-BIO-4 is presented in underline/strikethrough format in Section 4.2.5 of the Draft PEIR. The clarification to MM-BIO-4 does not constitute significant new information under Section 15088.5(b) of the CEQA Guidelines, and no new significant environmental impacts of the program have been identified.

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B-17

12. MM-Bio-5 discusses Wildlife Movement Evaluation and Maintenance, and states a qualified biologist with experience evaluating and designing wildlife corridors and crossings shall evaluate the potential for each future project to impede, impact, or improve wildlife movement, corridors, or native wildlife nursery sites. This analysis should include a literature study of all relevant documentations of corridors in the area, including the SR-67 Multi-species Connectivity Planning (SDMMP, 2017). The Department also recommends that bridges for traffic are used preferentially over tunnels for wildlife, that all wildlife corridors are consistent with MSCP standards, and that any project with impacts to wildlife corridors be analyzed fully in subsequent environmental documentation.

B-18

13. The discussion of cumulative impacts in section 4.2.5.1 of DPEIR states that "the cumulative impacts from past, present, and probable future projects is consider[ed] cumulatively significant." Then the document goes on to say, "With implementation of MM-BIO-1 through MM-BIO-5, cumulative impacts on biological resources would be avoided. Therefore, the incremental contribution of the proposed project to cumulative biological impacts would not be cumulatively considerable." The document also says that the projects would comply with the proposed Subarea Plan. As stated earlier, some projects appear to be inconsistent with the proposed SAP. The information provided in the DPEIR is insufficient to determine that the projects identified would not contribute considerably to cumulative effects. The Department recommends that final PEIR state how it will analyze future project cumulative impacts in subsequent environmental documents.

B-19

14. Given the programmatic nature of the environmental document, the Department acknowledges that the Lead Agency is not obligated to fully analyze subsequent activities for which insufficient data exists. However, Findings of Significance should only be made when those Findings are supported by substantial evidence in the record (CEQA § 15091(b)). For those aspects of the Proposed Project that have not been fully studied, Findings of Significance should be set aside, these include Hydrology and Water Quality and Land Use Planning, since there are aspects of the projects that would have the potential to significantly impact resources without mitigation.

RESPONSE

B-17 The City agrees with the commenter that wildlife movement evaluation and maintenance should include a literature study of all relevant documentations of corridors in the area, including the SR-67 Multi-species Connectivity Planning (SDMMP, 2017). Specific future development projects included in the Mobility Element that could result in improvements over wildlife movement corridors would be evaluated on a project-by-project basis and for consistency with the SAP, with consultation with the Wildlife Agencies. MM-BIO-5 has been revised to provide for the consideration of bridges over wildlife movement corridors. The changes are reflected in underline/strikethrough format in Section 4.2.5 of the Final PEIR.

B-18 The PEIR cumulative impact analysis was prepared in accordance with Section 15130(b)(1)(A) of the CEQA Guidelines with an assessment of past, present, and probable future projects producing related or cumulative impacts. The determination of a cumulatively significant impact for the Mobility Element as a whole does not preclude individual projects being assessed environmentally from having their own cumulative impact analysis. Projects tiering off from this PEIR would be subject to Mitigation Measures MM-BIO-1 through MM-BIO-5, which require each individual project to be consistent with the SAP and to mitigate biological impacts to a level of less than significant. All future projects would be...

LETTER

RESPONSE

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[B-18 response continued from previous page] ...required to comply with CEQA and the appropriate CEQA process will be determined for each, which may include an addendum, supplemental, or subsequent CEQA document. Furthermore, such projects would be subject to any additional mitigation identified in their respective environmental documents as formulated through consultation with the Wildlife Agencies.

B-19 See Response to Comment B-12. The City concurs with the commenter that the City is not obligated to fully analyze future development activities identified in the Mobility Element for which insufficient data exists under this PEIR. The proposed Mobility Element assessed under the PEIR is a planning document that does not approve specific construction projects nor identify project designs for which significance determinations have been made. The City will consider proposed Findings of Fact under State CEQA Guidelines section 15091(b) supported by substantial evidence in the administrative record for each impact conclusion in the PEIR based on what is reasonably foreseeable at the programmatic level of review. (See *In re Bay-Delta Programmatic Env't'l Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1172, 1174.)

LETTER

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, MS 240
SAN DIEGO, CA 92110-2714
PHONE (619) 688-6968
FAX (619) 688-4299
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

August 28, 2017

11-SD-VAR
(52, 67, 125)
Santee Mobility Element Update
SCH# 2016121022

Michael Coyne
City of Santee
10601 Magnolia Avenue
Santee, CA 92071

Dear Mr. Coyne:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the Santee Mobility Element Update (Plan) Draft Program Environmental Impact Report (DPEIR), area served by State Route 52 (SR-52), State Route 67 (SR-67), and State Route 125 (SR-125). The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability.

- C-1** The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

Caltrans has the following comments:

Traffic Engineering and Analysis Branch Review

- C-2** The existing congested segment of SR-52 between Santo Road and Mast Boulevard needs to be represented and stated in the DPEIR including but not limited to all necessary data calculations such as vehicle over capacity (v/c), Vehicle Miles Traveled (VMT) and other traffic metrics should be shown and written in the Table such as Table 4.6-10 Existing Freeway Segment LOS, and all other pertinent Tables.

- C-3** The traffic operational issue mentioned below at the SR-52 Westbound (WB) Ramps / Mast Boulevard intersection during the AM Peak hour needs to be included and shown in all pertinent table such as for Table 4.6-8 Existing Peak Hour Intersection LOS.

- C-4** Section 4.6 Transportation and Traffic page 4-41 of the DPEIR states that the proposed Mobility Element would not have any significant impact on study area freeway segments as shown on Table 7.5 of the Traffic Impact Study (TIS) Appendix C. However, a

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

RESPONSE

- C-1** Comment noted. As this comment does not raise an environmental issue, no additional response or action is required.
- C-2** As stated in the Draft PEIR, Table 4.6-10 - the Existing Freeway Segment Level of Services includes v/c calculations based upon data obtained from Caltrans 2012 Traffic Volumes on California State Highways and Caltrans 2012 Annual Average Daily Truck Traffic on the California State Highway System, such as traffic volumes, number of lanes, directional split, peak hour percentages, and heavy vehicles percentage. These data are included in Appendix G of the technical report. In addition, LOS analysis performed is consistent with the Regional SANTEC/ITE Guidelines, a standard for projects in the San Diego region. This analysis equation does not allow for the calculation to include other factors that may affect freeway operation such as grades, weaving, or driver behaviors. As a result, the freeway LOS analysis performed along SR-52 is considered adequate. Caltrans's Local Development-Intergovernmental Review (LD-IGR), which was revised in November 9, 2016 stated that all transportation impact analysis should analyze and propose VMT mitigation based on the most recent approved version of OPR's CEQA Guidelines and Technical Advisory. However as of July 13, 2017 (1st date of public review for the Draft PEIR), OPR still has not issued an approved version of the CEQA Guidelines and Technical Advisory. Therefore, VMT analysis, from a traffic perspective was not included in the Draft PEIR Transportation section. However, VMT was considered as a part of the Greenhouse Gas Emissions analysis, please refer to Table 4.4-3 of the Draft PEIR for more information.
- C-3** The traffic impact analysis was conducted using HCM 2010 methodology which is the standard methodology that San Diego and District 11 utilize for intersection analysis. The LOS for existing conditions of the segment of SR-52 between Santo Road and Mast Boulevard was based on HCM 2010 and the latest data available from Caltrans at the time of the analysis.

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Mr. Coyne
August 28, 2017
Page 2

- C-4** ↑ segment on SR-52 between Santo Road and Mast Boulevard is listed as one of the Spring 2014 Top 10 Congested Segments as shown in the attachment herein and obtained from Caltrans District 11, in San Diego. Therefore, this congested segment on SR-52 should be correctly represented for the Existing conditions in the analysis when compared to the proposed Mobility Element with Existing Land Uses.
- C-5** { • Section 4.6 Transportation and Traffic page 4-42 of the DPEIR also states that the project would not have any significant impact to any of the study area intersections as referenced by Table 7.7 of the Technical Report and TIS. However, page 110 of the Technical Report and TIS dated July 2017 acknowledges that one traffic operational issue, not previously identified via intersection or freeway analysis, is the poor operations and excessive westbound queuing at the SR-52 WB Ramps / Mast Boulevard intersection during the AM Peak hour. Any additional traffic at this intersection may worsen the commute conditions of the traveling public, therefore a mitigation is required to address what was raised as operational issue in the report. Please refer to the attachment herein.
- C-6** { Any facilities within the States Right-of-Way (R/W) that are currently operating in unacceptable conditions will require mitigation measures when there is a local development proposal or land use change that will generate additional traffic which results in increased delays for the travelling public.
- Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards. Therefore, the Plan will need to mitigate for the additional traffic to eliminate or reduce to a level of insignificance the traffic impacts on the State Highway System.
- Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any “fair share” monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.
- C-7** { State Route 52 (SR-52) Corridor Study
- Thank you for including the findings of the SR-52 Corridor Study in the development of the Plan. Please continue to consider the concepts found in this study as projects proposed in the Plan are developed.
- Complete Streets and Mobility Network
- Caltrans appreciates that the Plan includes multimodal transportation improvements to improve safety, access, and mobility for the community of Santee.
- ↓ To reduce greenhouse gas emissions and achieve California’s Climate Change target, Caltrans is

*“Provide a safe, sustainable, integrated and efficient transportation system
to enhance California’s economy and livability”*

RESPONSE

[**C-3** response continued from previous page] As documented in the technical report (Section 3.5.4), the queueing issue at the westbound approach to the SR-52 Westbound (WB) Ramps / Mast Boulevard intersection is due to the chokepoint created where the two receiving lanes on the ramp merge into a single lane approximately 475 feet past the Mast Boulevard intersection.

The City of Santee has conducted the SR-52 Corridor Study to improve traffic conditions along SR-52, including this specific intersection. Please refer to the SR-52 Corridor Study for detail analysis as well as traffic operation improvement measure recommendations. In addition, it is important to note that the developer of Fanita Ranch is currently preparing a Project Study Report at SR-52 including this very interchange.

The Mobility Element is high-level planning document that does not include changes to land uses that would generate additional vehicle trips. As stated in the proposed Mobility Element Policies (Policy 1.1 through 1.4), the the purpose of the Mobility Element is to create a well-connected, multimodal transportation network within the City that shifts the mode share from driving to bicycling, walking and transit. Proposed network changes identified in the Mobility Element would support a multimodal transportation network and foster non-vehicular modes of travel. These policies to reduce travel via private passenger vehicles would not result in additional traffic on City streets or Caltrans facilities. The Draft PEIR adequately discloses traffic conditions with and without the proposed Mobility Element based on standard practice and analysis methodology; therefore, no additional analysis would be required.

C-4 See Response to Comment C2.

C-5 See Response to Comment C3.

C-6 As disclosed in the Draft PEIR Section 4.6.5.3, the San Diego Forward: The Regional Plan includes two Revenue Constrained freeway improvement projects, one which would add two...

LETTER

Mr. Coyne
August 28, 2017
Page 3

implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City of Santee (City) to evaluate potential Complete Streets projects.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

C-7 The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within the Caltrans's R/W, and any corresponding technical studies.

Early coordination with Caltrans, in locations that may affect both Caltrans and the City is encouraged. If you have any questions, please contact Vanessa De La Rosa, Community Planning Liaison, at (619)688-4289 or by e-mail sent to vanessa.delarosa@dot.ca.gov.

Sincerely,



ROY ABBOUD, Acting Branch Chief
Local Development and Intergovernmental Review Branch

Enclosure: Spring 2014 Top 10 Congested Segments, Mobility Element (Circulation Element Update) excerpts, Technical Report and Traffic Impact Study excerpts.

RESPONSE

[C-6 response continued from previous page] ...freeway lanes to SR-52 from Mast Blvd. to SR-125 by 2035 and one which would add two managed lanes and one reversible lane to SR-52 from SR-15 to SR-125 by 2050. Due to the cost associated with these improvements it is economically infeasible for the City to independently implement these improvements, which are within the jurisdiction of Caltrans and SANDAG. In addition there is some uncertainty related to the actual development and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project level impacts and possibly provide the mechanism to mitigate them through fair share contributions, in addition to the forecasted funding planned by SANDAG and other funding sources consistent with the SANDAG Revenue Constrained RTP. Subject to available funding, the City will continue to work with Caltrans and SANDAG to assess feasible interim improvements to SR-52 to relieve congestion, as identified in the SR-52 Corridor Study (or variations of such improvements), to be implemented before the planned longer term improvements are implemented by Caltrans and SANDAG. Therefore impact to state facilities would remain significant and unavoidable.

C-7 Comment noted. The City will continue to coordinate with Caltrans and consult with Caltrans on applicable environmental documents as is the City's current practice. As no environmental issues were raised with this comment, no further response is required.

LETTER



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

August 7, 2017

File Number 3300300

Mr. Michael Coyne
City of Santee
Development Services
10601 Magnolia Avenue
Santee, CA 92071

Dear Mr. Coyne:

SUBJECT: Mobility Element Draft Environmental Impact Report

Thank you for the opportunity to comment on the City of Santee's Mobility Element Draft Environmental Impact Report (EIR). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG's comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

Smart Growth

SANDAG appreciates that the City of Santee has prioritized multimodal transportation, transit-oriented development, and land use changes that support the goals of the Smart Growth Concept Map and Regional Plan. Implementation of the Mobility Element's goals and objectives will help facilitate more transportation options for current and future residents.

A key goal of the Regional Plan is to focus growth in smart growth opportunity areas. The City of Santee has four smart growth opportunity areas: Existing/Planned Town Center (ST-1), a Potential Mixed-Use Transit Corridor (ST-2), and two Potential Community Centers (ST-3 and ST-4). The city should continue facilitating access to existing and future transit services in these areas.

Long Range Transportation

When referencing SANDAG's current Regional Transportation Plan (adopted in October 2015), please refer to "San Diego Forward: The Regional Plan" rather than "SANDAG's 2050 RTP."

RESPONSE

D-1 Comment noted. As this comment does not raise an environmental issue, no additional response or action is required.

D-2 The City acknowledges the key goal of the San Diego Forward: The Regional Plan to focus growth in smart growth opportunity areas. The Mobility Element policies and objectives and the identification of multimodal corridors as priority transportation improvement areas will facilitate the development of these smart growth areas.

D-3 Comment noted. The Final Program Environmental Impact Report (PEIR) reflects the retitling of SANDAG's 2050 RTP to San Diego Forward: The Regional Plan as requested by the commenter. The revisions are shown in underline/ strikethrough format throughout the applicable sections of the Final PEIR.

MEMBER AGENCIES

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LETTER

RESPONSE

On page 4-52 and 4-53, please consider updating the mitigation response to the following:

"None feasible. San Diego Forward: The Regional Plan includes two Revenue Constrained freeway improvement projects:

- SR 52 from Mast Blvd to SR 125 (addition of two Freeway Lanes; by 2035), and
- SR 52 from SR 15 to SR 125 (addition of two Managed Lanes and one Reversible Lane; by 2050)

~~The SANDAG 2050 RTP Revenue Constraint scenario includes plans to widen westbound SR-52 along several segments including from Santo Road to Mission Gorge Road, and eastbound SR-52 between Mast Boulevard to Mission Gorge Road from four mixed-flow lanes to six mixed-flow lanes with two reversible managed lanes. This project is expected to be completed by the Year 2040 under current SANDAG RTP. While improvements have been identified for the other impacted segments for SR-52 and for the impacted segments of SR-67 in the RTP, these improvements have been identified as a lower priority and no schedule or funding source has been identified. Due to the cost associated with these improvements, it is economically infeasible for the City to implement these improvements as well as out of proportion with the proposed project's impacts. In addition, since Caltrans has the decision-making authority on implementing any improvements to the identified freeway segments, the City cannot guarantee implementation or timing of any improvements to these freeway segments. In addition, there is uncertainty related to the actual development and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project level impacts and provide the mechanism to mitigate them through fair share contribution in addition to the forecasted funding planned by SANDAG and other funding sources consistent with SANDAG Revenue Constrained RTP. The City will attempt to work with Caltrans to implement interim measures to improve SR-52 as identified in the State Route 52 Corridor Study. However, the significant traffic impact to these freeway segments would remain significant and unavoidable."~~

Transportation Demand Management

SANDAG appreciates the inclusion of Transportation Demand Management (TDM) and parking management strategies in the proposed update of the Mobility Element of the City of Santee's General Plan. In addition to TDM policies identified in the draft Mobility Element, please also consider the following TDM strategies to help mitigate traffic impacts associated with future growth within and around the city:

- Encourage developers to incorporate TDM-supportive capital improvements and programs through the development review and entitlement process. Development of a TDM ordinance aligns with policies and objectives identified in the proposed update of the Mobility Element and supports the city's commitment to complete streets investments.
- Consider allocating curb space to support shared mobility services, such as designated passenger pick-up and drop-off zones for on-demand rideshare services. Provision and promotion of shared mobility services can reduce reliance on the private vehicle and can also help facilitate connections to transit stations and enable the development of mobility hubs. Additional information on mobility hubs is available at SDForward.com/mobilityhubs.

D-4 The City agrees to the recommended change by the commenter in that it more accurately titles the Regional Transportation Plan and describes the proposed Revenue Constrained freeway improvements to SR-52. The revisions have been made to Section 4.6.4.6 of the Draft PEIR and are reflected in underline/ strikethrough format. The revisions do not add significant new information under Section 15088.5(b) of the CEQA Guidelines and only further clarify why mitigation for freeway impact segments is infeasible.

D-5 The City agrees with the recommendations of the commenter to encourage Transportation Demand Management (TDM) within the City as a strategy to meet the City's overarching goal of a well-connected multimodal transportation network. As the commenter noted, the proposed Mobility Element does identify TDM strategies. Policy 1.4 of the Mobility Element specifically identifies TDM strategies such as creating a mobility hub at the existing Santee Trolley Square by providing features such as bikeshare, bike parking, and carshare. As Mobility Element policies are implemented, the City will consider the commenter's additional recommended TDM strategies, such as encouraging developers to incorporate TDM-supportive improvements in their developments and allocating curb space for on-demand rideshare services. The City will also consider updating its development standards to include TDM strategies as part of a comprehensive Zoning Ordinance update.

LETTER

D-5

- Provide convenient bike amenities that support the city's improvements to bike infrastructure. This includes secure bike parking and bike repair stands near transit, major destinations, and along existing and planned bike facilities.

Additionally, consider partnering with the SANDAG TDM program, iCommute, to promote and incentivize regional TDM services that encourage the use of transportation alternatives. This includes the SANDAG Vanpool Program, online ridematching services, the Guaranteed Ride Home program, and bike encouragement programs such as free bike education courses; the GO by BIKE Mini-Grant program; and the Walk, Ride, and Roll to School education program. Information on the SANDAG TDM program can be accessed through iCommuteSD.com.

Other Considerations

SANDAG has a number of additional resources that can be used for additional information or clarification on smart growth and TDM. These can be found on our website at sandag.org:

- SANDAG Regional Parking Management Toolbox
- Riding to 2050, the San Diego Regional Bike Plan
- Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
- Integrating Transportation Demand Management into the Planning and Development Process — A Reference for Cities
- Trip Generation for Smart Growth
- Parking Strategies for Smart Growth
- Designing for Smart Growth, Creating Great Places in the San Diego Region

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on the City of Santee's Mobility Element Draft EIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

KHE/hbr

RESPONSE

D-6 Comment noted. Please see response B-5 above. The Mobility Element is a high-level policy and planning document that identifies general mobility objectives and policies. As these policies are implemented, specific strategies such as those related to Transportation Demand Management will be considered if they further these objectives and policies. Many of the strategies and planning tools suggested by the commenter are also listed within the proposed Mobility Element. As the commenter does not raise any specific issue with the environmental analysis, no further response is required.

LETTER



August 28, 2017

Michael Coyne, Associate Planner
City of Santee
Department of Development Services
10601 Magnolia Avenue
Santee, CA 92071

**SUBJECT: NOTICE OF AVAILABILITY OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR THE CITY OF SANTEE'S MOBILITY ELEMENT (CIRCULATION ELEMENT UPDATE)
SCH# 2016121022**

Dear Mr. Coyne:

The City of San Diego (City) appreciates the opportunity to review the City of Santee's Mobility Element (Circulation Element Update) Draft Program Environmental Impact Report (DPEIR). The City's Development Services Department has provided comments to the City of Santee's Department of Development Services on the DPEIR for this project, as further detailed below.

Development Services Department – Ismail Elhamad, Associate Engineer – Traffic,
IElhamad@sanidiego.gov, 619-446-5494

- E-1** { 1. We are not commenting on the different scenarios in the document, but only on the areas affecting the City of San Diego. However, the document should clarify whether the recently approved Castlerock and Sycamore Landfill projects are included in the "Adopted Land Uses" utilized in this document.
- E-2** { a) The segments of Mast Boulevard between SR-52 and West Hills Parkway and West Hills Parkway between Mast Boulevard and Mission Gorge Road are within the City of San Diego.
- E-3** { b) The existing functional classification for Mast Boulevard between SR-52 ramps and West Hills Parkway is four-lane collector (not four lane major).
- E-4** { c) The existing functional classification for West Hills Parkway between Mission Gorge Road and Mast Boulevard is four-lane collector.
- E-5** { 2. Figure 2-8, Current Roadway Classification: The existing roadway classification for Mast Boulevard between SR-52 ramps and West Hills Parkway is four-lane collector.

RESPONSE

- E-1** Both Castlerock and the Sycamore Landfill Master Expansion are incorporated into all of the Year 2035 model runs as a part of the "Adopted Land Uses". Year 2035 model output was already provided in Appendix H of the technical report. Both the Castlerock and Sycamore Landfill land uses were incorporated into TAZ 2135 of the model.
- E-2** This comment identified the segment of Mast Boulevard between SR-52 and West Hills Parkway and West Hills Parkway between Mast Boulevard and Mission Gorge Road as a City of San Diego facility. The technical report and DPEIR are revised to reflect the correct jurisdiction.
- E-3** Mast Boulevard between SR-52 ramps and West Hills Parkway is currently a four-lane roadway with a striped median. This segment is not classified in any of the City of San Diego community plans (Tierrasanta, Navajo, East Elliot), and the City of San Diego General Plan Land Use and Street System Map classified this road as a Major Arterial. Per the City of San Diego Street Design Manual, a four lane Major Street has a curb-to-curb width of 76 feet. This section of Mast Boulevard has a curb-to-curb width of 85 feet and it connects a Major Arterial to a major freeway. Thus, the traffic analysis correctly analyzed this roadway segment as a four-lane Major.
- E-4** West Hills Parkway between Mission Gorge Road and Mast Boulevard is currently constructed as a four-lane roadway with a striped median and turn pockets at all intersections. This roadway segment is also not identified in any of the City of San Diego community plans, and the City of San Diego General Plan Land Use and Street System Map classified this road as a Major Arterial. Per the City of San Diego Street Design Manual, a four lane Major Street has a curb-to-curb width of 76 feet. This section of West Hills Parkway has a curb-to-curb width of 85 feet and it connects a major arterial to another major arterial. Thus, the traffic analysis correctly analyzed this roadway segment as a four-lane Major.
- E-5** See Response to Comment E-3.

LETTER

Page 2
Mr. Michael Coyne
August 28, 2017

- E-6** { 3. Page 4.6-6, Roadway Segments: Mission Gorge Road runs from where Friars Road ends at Mission Gorge Road (north/south) not from Riverdale Road.
- E-7** { 4. Table 4.6-5, Existing Roadway Segment LOS, Page 12:
a) The portion of Mast Boulevard between SR-52 and West Hills Parkway is within the City of San Diego and functions as a four-lane collector.
- E-8** { b) Mission Gorge Road between Zion Avenue and Princess View Drive and between Princess View Drive and Jackson Drive includes segments that are four-lane and five-lane major streets with LOS E capacity of 40,000 and 50,000, so these should be broken out separately.
- E-9** { c) The segment of West Hills Parkway between Mission Gorge Road and Mast Boulevard is within the City of San Diego and functions as a four-lane collector.
- E-10** { 5. Section 3.6.2.4 Street and Freeway, Page 3-16: Please revise the Mast Boulevard bullet item to cover only the portion of Mast Boulevard within the City of Santee.
- E-11** { 6. Table 4.6-8 Existing Peak Hour Intersection LOS: The intersection of West Hills Parkway/Mast Boulevard shows AM peak hour and PM peak Hour LOS D and C, respectively. Previously certified environmental documents indicated that this intersection operates at a lower level of service and mitigations at this location may not yet have been implemented. Please review this intersection level of service calculation and provide clarification of the existing LOS at this intersection.

The City of San Diego Planning Department staff is available to meet with City of Santee staff and consultants to coordinate information and analysis moving forward for comprehensive planning updates. If you have any questions or wish to set up a meeting, please contact Rebecca Malone at (619) 446-5371.

Sincerely,



Jeff Murphy, Director
Planning Department

RM/emp

cc: Ismail Elhamad, Associate Engineer – Traffic, Development Services Department

RESPONSE

- E-6** This comment identified the beginning of Mission Gorge Road. The technical report and the Draft PEIR have been revised to reflect the start of Mission Gorge Road, as reflected in the Final PEIR. This revision does not affect the analysis results or findings of the Final PEIR.
- E-7** See Response to Comment E-3.
- E-8** The technical report and the Draft PEIR have been revised to reflect the existing cross-sections of Mission Gorge Road, which are currently constructed as a six-lane roadway between Zion Avenue and Old Cliffs Road, four-lane roadway between Old Cliffs Road and 700 ft east of Old Cliffs Road, five-lane roadway between 700 ft east of Old Cliffs Road and Katelyn Court, and as a six-lane roadway between Katelyn Court and Princess View Drive.
- E-9** See Response to Comment E-4.
- E-10** The change is reflected in the Final EIR and is represented in underline/strikethrough format.
- E-11** As documented in Section 2.4.2 of the Proposed Update to Existing Circulation Element (Mobility Element) Technical Report and Traffic Impact Study, the analysis for the PEIR was conducted using Synchro 8 and the Highway Capacity Manual 2010 (HCM 2010) methodology. In comparison, the Sycamore Landfill Master Plan Expansion Final Traffic Impact Analysis / EIR analyzed the same intersection using Synchro 7 and the HCM 2000 methodology. The different software version and methodology results in different delay and LOS. It is standard engineering practice to evaluate intersection operation using the latest HCM methodology. The intersection operational analysis for the PEIR was conducted correctly, and no additional analysis is required.

LETTER



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555
www.sdcountry.ca.gov/pds

August 31, 2017

Michael Coyne
Associate Planner
City of Santee Department of Development Services
10601 Magnolia Avenue
Santee, CA 92071

Via e-mail: mcoyne@cityofsanteeca.gov

RESPONSE TO COMMENTS ON A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF SANTEE'S MOBILITY ELEMENT UPDATE

Dear Mr. Coyne,

The County of San Diego (County) reviewed the City of Santee's (City) Notice of Availability of a Draft Program Environmental Impact Report (DPEIR) for the Mobility Element Update dated July 13, 2017.

The County appreciates the opportunity to review the City's Mobility Element Update and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

TRANSPORTATION/TRAFFIC

- F-1** 1. The Project goal of the Mobility Element is "a balanced, interconnected, multimodal transportation network". DPEIR Figure 2-5 – Existing Bicycle Facilities, identifies an existing gap in the Class II Bike Lane Network with the existing gap of Mast Boulevard. The proposed Mobility Element network will impact connections, therefore creating a conflict with the stated goal of an interconnected network for all users of the Mobility Element.
- F-2** 2. DPEIR pg. 3-20 "Option 2 – Extend Mast Boulevard from its current eastern terminus point in Santee to the western terminus point in the County of San Diego (Lakeside)", which would be constructed/extended as a new Four-Lane Major Arterial Roadway. The Mast Boulevard Option 2 is the County's preferred option and consistent with the County's Mobility Element Plan.
- F-3** 3. DPEIR pg. 4-49 "Level of Significance Prior to Mitigation" identifies additional cumulative impacts to Woodside Avenue in the City of Santee, while there is not a cumulative impact identified under the "Mast Boulevard Extension Option". A summary table in Section 4.6 of the DPEIR identifies the direct and cumulative traffic impacts of each alternative and may help to identify the differences between the alternatives.
- F-4** 4. Mitigation Measure – C – TRA-3 – "Widen Pepper Drive between Graves Avenue and Churchill Drive" indicates that the City of Santee shall work with the County of San Diego through fair share contributions to acquire additional right-of-way (ROW) and widen the roadway segment of Pepper Drive between Graves Avenue and Churchill Drive to a four-lane Secondary/Arterial Collector. Pepper Drive

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- F-1** Comment noted. Two options for proposed roadway network changes related to Mast Boulevard between the City of Santee and the City of Lakeside are analyzed in the PEIR: no connection and extending Mast Boulevard as a new four lane major arterial roadway (see Section 3.6.2 of PEIR). Under the no connection option, a Class I multi-use path would be provided, completing the existing gap in the bicycle network. Under the Mast Boulevard extension option, a Class II Bike Lane would be provided along Mast Boulevard. Figure 5-2 of the technical report and Figure 7-2 of the Mobility Element are revised to reflect this option. The two options will be presented to the City Council; either could be approved because both were fully analyzed under CEQA in the PEIR.
- F-2** This comment indicates the County of San Diego's preference. Comment noted and no additional response is required. Please also see Response to Comment F-1.
- F-3** This comment requests a summary comparison between the two proposed options for Mast Boulevard, which is a request to present data in a different format already provided in Appendix C of the Draft PEIR (Technical Report and Traffic Impact Study). As the comment does not identify any deficiency associated with the Draft PEIR, the comment is noted and no additional response would be required.
- F-4** As documented in MM-C-TRA-3, widening Pepper Drive between Graves Avenue and Churchill Drive would mitigate the project impact to this roadway segment. However, as noted, due to uncertainties with the implementation of this mitigation measure, including but not limited to inconsistency with the County's Mobility Element designation, this mitigation was considered to be infeasible. Therefore, this roadway would not be widened and the impact would remain significant and unavoidable unless County policy changes.

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- F-4** is classified as a two-lane (2.2C) Light Collector in the County's Mobility Element Plan, which is inconsistent with the City's four-lane Secondary/Arterial Collector classification.
- F-5** 5. Traffic Impact Study – Table 6.3 identifies that the Mast Boulevard extension is projected to carry over 15,000 vehicles per day and provide regional connectivity. The County's preferred option is the extension of Mast Boulevard to improve regional network options and balance transportation choices for regional travel by businesses and residents.

VECTOR CONTROL

- F-6** 1. The County's Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP respectfully requests that when implementing transportation improvements or environmental mitigation, impacts from possible mosquito breeding sources are considered. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development.
2. For your information, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at:
http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf
- The California Department of Public Health Best Management Practices for Mosquito Control in California is available at:
<http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf>
3. The VCP appreciates the opportunity to participate in the environmental review process for this Project. If you have any questions regarding these comments, please contact Daniel Valdez at 858-688-3722 or by e-mail at Daniel.Valdez@sdcounty.ca.gov.

The County looks forward to receiving future documents and/or notices related to this Project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Timothy Vertino at 858-495-5468 or by e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,



MARY KOPASKIE BROWN, AICP, MCIP
Chief, Advance Planning Division
Planning & Development Services

E-mail cc: Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Vincent Kattoula, CAO Staff Officer, LUEG
Nick Ortiz, Project Manager, PDS
Everett Hauser, Transportation Specialist, PDS
Erin Jensen, Administrative Analyst, DEH

F-5 This comment indicates the County of San Diego's preference. Comment noted and no additional response would be required. Please also see Response to Comment F-1.

F-6 Comment noted for future projects contemplated in the proposed Mobility Element. Because this comment does not raise an environmental issue specific to the Mobility Element, no further response is required.